

To: Rao, Kate[Rao.kate@epa.gov]
Cc: Rumrill, Nancy[Rumrill.Nancy@epa.gov]; Jonathan.Koplos@cadmusgroup.com[Jonathan.Koplos@cadmusgroup.com]; Albright, David[Albright.David@epa.gov]
From: JAMES D WALKER
Sent: Sat 2/11/2017 9:31:16 PM
Subject: RE: Subject: Summary of Conference Call Meeting on the Gunnison Project UIC Class III permit application with Excelsior, ADEQ, and EPA.

Hi Kate,

The previous version of this email contained some extraneous information from other emails I used to draft this summary. Please disregard the previous version.

The following topics were discussed during the February 9, 2017 conference call with Excelsior, ADEQ, and EPA

- a. Pilot-scale stage operations prior to commercial ISR operations
- b. Inclusion of basin fill saturated intervals and the upper portion of the sulfide in the aquifer exemption (AE) zone
- c. Observation/monitoring well placement at the southern and western perimeter of Area of Review (AOR); re-evaluate AOR and AE at a later date
- d. Other monitoring: 30-day rolling average for over-extraction to injection volume and use of intermediate monitoring wells
- e. Mechanical integrity testing requirements
- f. Sampling requirements for closure and post-closure monitoring
- g. Proposed placement of intermediate monitoring well rings in the wellfield
- h. Natural groundwater velocity in the AOR
- i. Placement of monitoring wells for closure and post-closure monitoring.
- j. POC well placement rationale
- k. Excelsior Power Point Presentation of the discussion topics.

Excelsior expressed concerns about the EPA schedule for completion of EPA written comments on the Excelsior responses to earlier EPA comments on the application and when they could expect to receive a format comment letter from EPA. Walker stated that the previous Cadmus comments will require review and updating to account for the proposed changes presented and discussed in the three conference calls held with Excelsior and ADEQ over the past three weeks. Decisions on the acceptance of those changes will require internal EPA discussions. Walker requested that the Power Point presentation be provided for further review of the

Excelsior proposals for changes to the application and responses to EPA concerns listed above. The PP presentation was provided the next day. The remaining issues of concern will be presented in the updated Cadmus comments and the EPA formal comment letter.

The next meeting was scheduled for February 23.

Thanks,

Jim